

Exhibit D

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

MARGUERITE CARRUBBA,
Plaintiff,

VERSUS CIVIL ACTION NO: 1:07cv1238

HARRISON COUNTY, MISSISSIPPI,
by and through its Board of
Supervisors; HARRISON COUNTY
SHERIFF, George Payne;
WAYNE PAYNE; DIANE GATSON RILEY;
STEVE CAMPBELL; RICK GATSON;
RYAN TEEL; KARLE STOLZE;
WILLIAMS PRIEST; JAMES A.
GONDLES, JR; AMERICAN
CORRECTIONAL ASSOCIATION;
JOHN AND JANE DOES 1-3; HEALTH
ASSURANCE, LLC AND J.L. WHITE,
Defendants.

DEPOSITION OF KARL STOLZE

Taken at the offices of Dukes, Dukes,
Keating & Faneca, 2909 13th Street,
Sixth Floor, Gulfport, Mississippi, on
Tuesday, September 22, 2009, beginning
at 8:36 a.m.

REPORTED BY:

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1 Cell Number 7 at 11:02:53-ish, did you see
2 Marguerite being a problem at any time on this
3 booking video?

4 A. No.

5 Q. All right. We'll go through it frame by
6 frame. And it's hard to tell what's going on in
7 there, isn't it?

8 A. Yes.

9 Q. I mean, it's not the best quality film.
10 And at 11:03:26, that's Marguerite sitting on the
11 floor, isn't it?

12 A. Yes.

13 Q. And at 11:03:28, is that you coming out
14 or Priest?

15 A. Bump it forward a little bit. It looks
16 like me, yes.

17 Q. All right. And when you leave at
18 11:03:32, Marguerite is cuffed and on the floor,
19 shackled and on the floor; isn't that right?

20 A. Yes.

21 Q. All right. Tell us what happened that
22 caused you have to go back into Holding Cell
23 Number 7, take Marguerite, spend some time with
24 her, and then when you walk out, she's shackled on
25 the floor.